

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Denise Carlon, Esquire

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Attorneys for Secured Creditor

Nationstar Mortgage LLC d/b/a Mr. Cooper



Order Filed on September 28, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

In Re:

Irene Jacome-Espinoza

Debtor.

Case No.: 17-14949 VFP

Adv. No.:

Judge: Vincent F. Papalia

**CONSENT ORDER CURING POST-PETITION ARREARS AND CONCLUDING  
FORBEARANCE PERIOD**

The relief set forth on the following pages, numbered two (2) through three (3) is hereby  
**ORDERED.**

**DATED: September 28, 2020**

  
\_\_\_\_\_  
**Honorable Vincent F. Papalia**  
**United States Bankruptcy Judge**

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Debtor: Irene Jacome-Espinoza

Case No: 17-14949 VFP

Caption of Order: CONSENT ORDER CURING POST-PETITION ARREARS AND CONCLUDING FORBEARANCE PERIOD

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This matter having been brought before the Court by Denise Carlon, Esq., KML Law Group, P.C., attorneys for Secured Creditor, Nationstar Mortgage LLC d/b/a Mr. Cooper holder of a mortgage on real property located at 416 18th Street, Apt 2, Union City, NJ, 07087, with the consent of James Fitzpatrick, Esq., attorney for Debtors,

It is **ORDERED, ADJUDGED and DECREED** that as of September 15, 2020 Debtor is in arrears outside of the Chapter 13 Plan to Secured Creditor for payments due August 2020 through September 2020 for a total post-petition default of \$4,903.44 ( 2 @ \$2,694.02, \$484.60 less suspense); and

It is further **ORDERED, ADJUDGED and DECREED** that the balance of the arrears in the amount of \$4,903.44 shall be added to the affidavit of amount due and paid through Debtors' Chapter 13 plan; and

It is further **ORDERED, ADJUDGED and DECREED** that the debtor will submit a modified plan within twenty days of the entry of this order; and

It is further **ORDERED, ADJUDGED and DECREED** that regular mortgage payments are to resume October 1, 2020, directly to Secured Creditor, Nationstar Mortgage LLC d/b/a Mr. Cooper, P.O. Box 619094, Dallas, TX 75261(Note: the amount of the monthly mortgage payment is subject to change according to the terms of the note and mortgage); and

It is further **ORDERED, ADJUDGED and DECREED** that for the Duration of Debtor's Chapter 13 bankruptcy proceeding, if the lump sum payment or any regular monthly mortgage payments are not made within thirty (30) days of the date said payment is due, Secured Creditor may obtain an Order Vacating Automatic Stay as to Real Property by submitting a Certification of Default to the Court indicating such payment is more than thirty days late, and Debtors shall have fourteen days to respond; and

It is further **ORDERED, ADJUDGED and DECREED** that a copy of any such application, supporting certification, and proposed Order must be served on the Trustee, Debtor, and Debtor's counsel at the time of submission to the Court; and

It is further **ORDERED, ADJUDGED and DECREED** that Secured Creditor is hereby awarded reimbursement of fees and costs in the sum of \$350.00 for attorneys' fees which is to be paid through Debtor's Chapter 13 plan.

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Debtor: Irene Jacome-Espinoza

Case No: 17-14949 VFP

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I hereby agree and consent to the above terms and conditions:

Dated:

9/28/2020

/s/ *Denise Carlon*

DENISE CARLON, ESQ., ATTORNEY FOR SECURED CREDITOR

I hereby agree and consent to the above terms and conditions:

Dated:

9/28/2020

/s/ *James Fitzpatrick*

JAMES FITZPATRICK, ESQ., ATTORNEY FOR DEBTOR